FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO Ticona Polymers, Inc.

AUTHORIZING THE OPERATION OF
Bishop Facility
Waste Water Treatment Plant
Plastics Material and Resin Manufacturing

LOCATED AT

Nueces County, Texas Latitude 27° 34' 15" Longitude 97° 49' 47" Regulated Entity Number: RN101625721

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No:	O3269	Issuance Date:	
For the Co	nmission		

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- 1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subparts G and FFFF, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113,

- Subchapters C, §113.120 and §113.890, respectively, which incorporates the 40 CFR Part 63 Subpart by reference.
- 2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
 - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
- 3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
 - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is

determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by [h_e/H_e]² as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- 4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
 - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 5. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 61, unless otherwise stated in the applicable subpart:
 - A. Title 40 CFR § 61.05 (relating to Prohibited Activities)
 - B. Title 40 CFR § 61.07 (relating to Application for Approval of Construction or Modification)
 - C. Title 40 CFR § 61.09 (relating to Notification of Start-up)

- D. Title 40 CFR § 61.10 (relating to Source Reporting and Request Waiver)
- E. Title 40 CFR § 61.12 (relating to Compliance with Standards and Maintenance Requirements)
- F. Title 40 CFR § 61.13 (relating to Emissions Tests and Waiver of Emission Tests)
- G. Title 40 CFR § 61.14 (relating to Monitoring Requirements)
- H. Title 40 CFR § 61.15 (relating to Modification)
- I. Title 40 CFR § 61.19 (relating to Circumvention)
- 6. For facilities where total annual benzene quantity from waste is greater than or equal to 10 megagrams per year and subject to emission standards in 40 CFR Part 61, Subpart FF, the permit holder shall comply with the following requirements:
 - A. Title 40 CFR § 61.342(c)(1)(i) (iii) (relating to Standards: General)
 - B. Title 40 CFR § 61.342(e)(2)(i) (ii) (relating to Standards: General)
 - C. Title 40 CFR § 61.342(f)(1), and (2) (relating to Standards: General)
 - D. Title 40 CFR § 61.342(g) (relating to Standards: General)
 - E. Title 40 CFR § 61.350(a) and (b) (relating to Standards: Delay of Repair)
 - F. Title 40 CFR § 61.355(a)(1)(iii), (a)(2), (a)(6), (b), and (c)(1) (3) (relating to Test Methods, Procedures, and Compliance Provisions)
 - G. Title 40 CFR § 61.355(k)(1) (6), and (7)(i) (iv) (relating to Test Methods, Procedures, and Compliance Provisions), for calculation procedures
 - H. Title 40 CFR § 61.356(a) (relating to Recordkeeping Requirements)
 - I. Title 40 CFR § 61.356(b), and (b)(1) (relating to Recordkeeping Requirements)
 - J. Title 40 CFR § 61.356(b)(4) (relating to Recordkeeping Requirements)
 - K. Title 40 CFR § 61.356(b)(5) (relating to Recordkeeping Requirements)
 - L. Title 40 CFR § 61.356(c) (relating to Recordkeeping Requirements)
 - M. Title 40 CFR § 61.357(a), (d)(1), (d)(2) (d)(6) and (d)(8) (relating to Reporting Requirements)
 - N. Title 40 CFR § 61.357(d)(5) (relating to Reporting Requirements)
- 7. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 8. For the chemical manufacturing process specified in 40 CFR Part 63, Subpart F, the permit holder shall comply with 40 CFR § 63.103(a) (relating to General Compliance, Reporting, and

- Recordkeeping Provisions) (Title 30 TAC Chapter 113, Subchapter C, § 113.110 incorporated by reference).
- 9. For the chemical manufacturing facilities with a 40 CFR Part 63, Subpart G Group 1 or Group 2 wastewater streams that are also subject to 40 CFR Part 61, Subpart FF, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.120 incorporated by reference):
 - A. Title 40 CFR § 63.110(e)(1) (relating to Applicability), for 40 CFR Part 63, Subpart G applicability to Group 1 or 2 Wastewater Streams
- 10. For the chemical manufacturing facilities with a 40 CFR Part 63, Subpart G Group 2 wastewater stream, the permit holder shall comply with (Title 30 TAC Chapter 113, Subchapter C, § 113.120 incorporated by reference):
 - A. Title 40 CFR § 63.132(a), (a)(1), and (a)(1)(i) (relating to Process Wastewater Provisions General)
 - B. Title 40 CFR § 63.146(b)(1) (relating to Process Wastewater Provisions Reporting)
 - C. Title 40 CFR § 63.147(b)(8) (relating to Process Wastewater Provisions Recordkeeping)
- 11. For Group 1 wastewater streams the permit holder shall comply with the following requirements 40 CFR § 63.138 (relating to Process Wastewater Provisions Performance Standards for Treatment Processes Managing Group 1 Wastewater Streams and/or Residuals Removed from Group 1 Wastewater Streams) (Title 30 TAC Chapter 113, Subchapter C, § 113.120 incorporated by reference):
 - A. Title 40 CFR § 63.138(i)(1), (i)(1)(i) and (i)(1)(ii), for demonstration of total source mass flow rate requirements
- 12. For the chemical manufacturing facilities subject to leak detection requirements in 40 CFR Part 63, Subpart G, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.120 incorporated by reference):
 - A. General Leak Detection Requirements:
 - (i) Title 40 CFR § 63.148(d)(1) (3), and (e) (relating to Leak Inspection Provisions)
 - (ii) Title 40 CFR § 63.148(c), (g), (g)(2), (h), and (h)(2) (relating to Leak Inspection Provisions), for monitoring and testing requirements
 - (iii) Title 40 CFR §§ 63.148(g)(2), (h)(2), (i)(1) (2), (i)(4)(i) (viii), (i)(5), and 63.152(a)(1) (5), for recordkeeping requirements
 - (iv) Title 40 CFR §§ 63.148(j), 63.151(a)(6)(i) (iii), (b)(1) (2), (j)(1) (3), 63.152(a)(1) (5), (b), (b)(1)(i) (ii), and (b)(4), for reporting requirements
 - B. For closed vent system or vapor collection systems constructed of hard piping:
 - (i) Title 40 CFR § 63.148(b)(1)(ii) (relating to Leak Inspection Provisions), for monitoring and testing requirements
 - (ii) Title 40 CFR § 63.148(i)(6) (relating to Leak Inspection Provisions), for recordkeeping requirements

- C. For facilities operating flow indicators:
 - (i) Title 40 CFR § 63.148(f)(1) (relating to Leak Inspection Provisions), for monitoring and testing requirements
 - (ii) Title 40 CFR § 63.148(f)(1), (i)(3)(i) (relating to Leak Inspection Provisions), for recordkeeping requirements
 - (iii) Title 40 CFR § 63.148(j)(2) (relating to Leak Inspection Provisions), for reporting requirements
- 13. For process facilities subject to maintenance wastewater requirements as specified in 40 CFR § 63.1106(b), the permit holder shall comply with the requirements of 40 CFR § 63.105(b) (e) (relating to Maintenance Wastewater Requirements) (Title 30 TAC Chapter 113, Subchapter C, § 113.560 incorporated by reference).
- 14. For miscellaneous chemical process facilities subject to maintenance wastewater requirements as specified in 40 CFR § 63.2485, Table 7, the permit holder shall comply with the requirements of 40 CFR § 63.105 (relating to Maintenance Wastewater Requirements) (Title 30 TAC Chapter 113, Subchapter C, § 113.890 incorporated by reference).
- 15. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

New Source Review Authorization Requirements

- 16. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
- 17. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 18. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of

operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

- 19. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
- 20. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Alternative Requirements

21. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have

reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the TCEQ Executive Director, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Permit Location

22. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

23. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Permit Shield

New Source Review Authorization References

Alternative Requirement

Unit Summary	1	2
Applicable Requirements Summary	1	6

Note: A "none" entry may be noted for some emission sources in this permit's "Applicable Requirements Summary" under the heading of "Monitoring and Testing Requirements" and/or "Recordkeeping Requirements" and/or "Reporting Requirements." Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
324-FLARE	FLARES	N/A	60A-1	40 CFR Part 60, Subpart A	No changing attributes.
324-PORTNK	LOADING/UNLOADING OPERATIONS	N/A	115C-1	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.
GRPVNTS	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	111-EFFLUNT, 112-EFFLUNT, 117-EFFLUNT, 121-EFFLUNT, 122-EFFLUNT, 125-EFFLUNT, 250-EFFLUNT, 324-DWSUMP, 324-DWSUMP, 324-MC415, 324-MC416, 324-MC417, 324-MC418, 324-MC421, 324-MC422, 324-MC423, 324-MC424, 324-MC425, 324-MS3020, 324-MS3021, 324-MS3020, 324-MS3021, 324-SWRSUM, 324V-2467, 324V-2562, 324V-2663, 324V-2663, 324V-2663, 324V-2663, 324V-2894, 324V-2963, 324V-2964, 324V-2963, 324V-2964, 324V-2964, 324V-2963, 324V-2964, 324V-2963, 324V-2964, 324V-2963, 324V-2964, 324V-3026,	111A-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRPVNTS	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	111-EFFLUNT, 112-EFFLUNT, 117-EFFLUNT, 121-EFFLUNT, 122-EFFLUNT, 125-EFFLUNT, 250-EFFLUNT, 32-2664SU, 324-DVTSUM, 324-DWSUMP, 324-MC415, 324-MC416, 324-MC421, 324-MC421, 324-MC423, 324-MC424, 324-MC425, 324-MS3020, 324-MS3021, 324-SNDFLS, 324-SWRSUM, 324V-1187, 324V-1188, 324V-2664, 324V-2562, 324V-2664, 324V-2664, 324V-2684, 324V-2890, 324V-2894, 324V-2963, 324V-2964, 324V-2963, 324V-2964, 324V-2963, 324V-2964, 324V-3026, 324V-TSUMP, BCUSUMP, CXSUMP, NYLONSUMP, SH1SUMP, SPSUMP, TO1SUMP, TO2CELCONS, TO2SUMP	115B-1	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
GRPVNTS	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	111-EFFLUNT, 112-EFFLUNT, 117-EFFLUNT, 121-EFFLUNT, 122-EFFLUNT, 125-EFFLUNT, 250-EFFLUNT, 32-2664SU, 324-DVTSUM, 324-DWSUMP, 324-MC151, 324-MC414, 324-MC415, 324-MC416,	63FFFF-1	40 CFR Part 63, Subpart FFFF	No changing attributes.

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
		324-MC417, 324-MC418, 324-MC421, 324-MC421, 324-MC422, 324-MC423, 324-MC424, 324-MS3020, 324-MS3021, 324-MS3021, 324-MS321, 324-MS321, 324-MX1310, 324-PLYMXS, 324-ROLBXS, 324-RXAREA, 324-SNDFLS, 324-SWRSUM, 324V-2467, 324V-2562, 324V-2664, 324V-2664, 324V-2890, 324V-2894, 324V-2963, 324V-2964, 324V-3026, 324V-TSUMP, BCUSUMP, CXSUMP, NYLONSUMP, SH1SUMP, SPSUMP, TO2CELCONS, TO2SUMP			
GRPVNTS	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	111-EFFLUNT, 112-EFFLUNT, 117-EFFLUNT, 121-EFFLUNT, 122-EFFLUNT, 125-EFFLUNT, 250-EFFLUNT, 32-2664SU, 324-DVTSUM, 324-DWSUMP, 324-MC151, 324-MC414, 324-MC415, 324-MC416, 324-MC417, 324-MC418, 324-MC421, 324-MC422, 324-MC423, 324-MC425, 324-MS3020, 324-MS3021, 324-MS3021, 324-MS3321,	63G-1	40 CFR Part 63, Subpart G	No changing attributes.

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
		324-MX1310, 324-PLYMXS, 324-ROLBXS, 324-RXAREA, 324-SNDFLS, 324-SWRSUM, 324V-1187, 324V-1188, 324V-2663, 324V-2664, 324V-2663, 324V-2890, 324V-2894, 324V-2963, 324V-2964, 324V-3026, 324V-TSUMP, BCUSUMP, CXSUMP, NYLONSUMP, SH1SUMP, SPSUMP, TO1SUMP, TO2CELCONS, TO2SUMP			
PROWWTP	TREATMENT PROCESS	N/A	63G-1	40 CFR Part 63, Subpart G	Vented to Control = Emissions from the treatment process are not vented to a control device., Fuel Gas System = The closed anaerobic biological treatment process is vented through hard-piping to a fuel gas system.
PROWWTP	TREATMENT PROCESS	N/A	63G-2	40 CFR Part 63, Subpart G	Vented to Control = Emissions from the treatment process are vented to a control device., By-Pass Lines = No by-pass lines., Closed Vent System = Closed vent system is not maintained under negative pressure and is subject to 40 CFR § 63.148., Combination of Control Devices = The vent stream is treated using a single control device., Control Devices = Flare., Alternate Monitoring Parameters = The EPA Administrator has approved alternate monitoring parameters.

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
324-FLARE	CD	60A-1	Opacity	40 CFR Part 60, Subpart A	§ 60.18(b) § 60.18(c)(1) § 60.18(c)(2) § 60.18(c)(3)(i)(A) § 60.18(c)(3)(i)(B) § 60.18(c)(6) § 60.18(e)	Flares shall comply with paragraphs (c)-(f) of § 60.18.	§ 60.18(d) § 60.18(f)(1) § 60.18(f)(2) § 60.18(f)(4)	None	None
324- PORTNK	EU	115C-1	voc	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(b)(2) § 115.214(b)(1)(B) § 115.214(b)(1)(D) § 115.214(b)(1)(D)(i)	Vapor pressure (at land- based operations). All land- based loading and unloading of VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division except as specified.	§ 115.214(b)(1)(A) § 115.214(b)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B)	None
GRPVNTS	EP	111A-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six-minute period for any source on which construction was begun after January 31, 1972. The emissions from this vent originate from colorless VOCs, non-fuming liquids, or other sources that are not capable of obstructing the transmission of light. These vents are not capable of exceeding the opacity standards of 30 TAC Chapter 111 and therefore no monitoring is required to demonstrate compliance.	None	None	None
GRPVNTS	EP	115B-1	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(b)(2)(A) § 115.127(b)(2)	A vent gas stream having a combined weight of the VOC or classes of	[G]§ 115.125 § 115.126(2) § 115.126(3)(B)	§ 115.126 § 115.126(2) § 115.126(3)	None

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						compounds specified in §115.121(b)(2) and (3) of this title equal to or less than 100 pounds in any continuous 24-hour period is exempt from the requirements of §115.121(b) of this title.		§ 115.126(3)(B)	
GRPVNTS	EP	63FFF-1	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(b) § 63.2455(b)(1) § 63.2455(b)(2) § 63.2455(b)(3)	For each continuous process vent, you must either designate the vent as a Group 1 continuous process vent or determine the total resource effectiveness (TRE) index value as specified in §63.115(d), except as specified in paragraphs (b)(1)-(3) of this section.	§ 63.115(d) [G]§ 63.115(d)(1) § 63.115(d)(2) § 63.115(d)(2)(i) [G]§ 63.115(d)(2)(ii) § 63.115(d)(2)(iii) § 63.115(d)(2)(iv) § 63.115(d)(3)(i) § 63.115(d)(3)(ii)	None	None
GRPVNTS	EP	63G-1	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.113(g) [G]§ 63.115(f)	The owner or operator of a Group 2 process vent with a concentration less than 50 ppm by volume shall maintain a concentration less than 50 ppm by volume, and comply with the sections as specified	[G]§ 63.115(a) [G]§ 63.115(c) § 63.115(e) § 63.115(e)(1) [G]§ 63.115(f)	[G]§ 63.118(e) [G]§ 63.152(a)	§ 63.115(e)(2) § 63.117(d) [G]§ 63.118(g) [G]§ 63.118(k) [G]§ 63.151(b) § 63.151(e) [G]§ 63.151(e) [G]§ 63.151(j) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b) [G]§ 63.152(c)(1) § 63.152(c)(1) § 63.152(c)(2) § 63.152(c)(2)(ii) § 63.152(c)(2)(iii) § 63.152(c)(2)(iii) § 63.152(c)(2)(iiii) § 63.152(c)(2)(iiii) § 63.152(c)(4)(ii)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
									§ 63.152(c)(4)(ii) § 63.152(c)(4)(iii) [G]§ 63.152(c)(6)
PROWWTP	PRO	63G-1	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.138(f) [G]§ 63.132(f) § 63.138(a)(5) § 63.140(a) § 63.140(c) § 63.144(a) § 63.145(e)(6)	Required mass removal (RMR) option shall be achieved for sources as specified and compliance tested based on the treatment process adopted and using procedures in §63.145(e) or §63.145(f).	\$ 63.138(j)(2) \$ 63.143(b) \$ 63.143(c) \$ 63.143(g) \$ 63.145(a) \$ 63.145(a)(1) \$ 63.145(a)(1) \$ 63.145(a)(3) [G]§ 63.145(a)(6) § 63.145(a)(6) § 63.145(a)(8) § 63.145(a)(9)(i) [G]§ 63.145(a)(9)(ii) § 63.145(e)(2) § 63.145(e)(2) § 63.145(e)(2) § 63.145(e)(3)(i) § 63.145(e)(3)(i) § 63.145(e)(4)(i) § 63.145(e)(5) § 63.145(e)(5) § 63.145(h)(2) § 63.145(h)(2) § 63.145(h)(2)(ii) § 63.145(h)(2)(ii)	§ 63.145(a)(3) [G]§ 63.145(a)(4) § 63.147(b) § 63.147(b)(7) § 63.147(e) [G]§ 63.152(a) [G]§ 63.152(f)	§ 63.143(c) § 63.146(b)(2) § 63.146(b)(4) § 63.146(b)(6) [G]§ 63.146(b)(9) § 63.146(b)(9)(ii) [G]§ 63.146(d) [G]§ 63.151(b) § 63.151(e) § 63.151(e)(2) § 63.151(e)(2) § 63.151(e)(3) § 63.151(e)(5) § 63.151(f)(1) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(3) § 63.151(f)(2) § 63.151(f)(3) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.152(b) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1) [G]§ 63.152(c)(1) § 63.152(c)(3) § 63.152(c)(3)(ii) § 63.152(c)(4)(iii) [G]§ 63.152(c)(6)
PROWWTP	PRO	63G-2	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.138(f) [G]§ 63.132(f) § 63.139(b)	Required mass removal (RMR) option shall be achieved for sources as	§ 63.138(j)(2) § 63.139(d)(3) § 63.139(e)	§ 63.143(e)(3) § 63.145(a)(3) [G]§ 63.145(a)(4)	§ 63.143(c) § 63.146(a) § 63.146(b)(2)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 63.139(f) § 63.140(a) § 63.140(b) § 63.140(c) § 63.144(a) § 63.145(e)(6) [G]§ 63.148(d) § 63.148(e)	specified and compliance tested based on the treatment process adopted and using procedures in §63.145(e) or §63.145(f).	§ 63.143(b) § 63.143(c) § 63.143(e) § 63.143(f) § 63.145(a) § 63.145(a) § 63.145(a)(1) § 63.145(a)(3) [G]§ 63.145(a)(4) § 63.145(a)(5) [G]§ 63.145(a)(6) § 63.145(a)(9)(i) [G]§ 63.145(a)(9)(ii) [G]§ 63.145(a)(9)(ii) § 63.145(e)(1) § 63.145(e)(2) § 63.145(e)(3) § 63.145(e)(3) § 63.145(e)(4)(i) § 63.145(e)(5) § 63.145(e)(6) § 63.145(h)(2)(ii) § 63.145(h)(2)(ii) § 63.145(h)(2)(iii) § 63.148(b)(1)(iii) § 63.148(b)(3) [G]§ 63.148(b)(3) [G]§ 63.148(b)(3) [G]§ 63.148(b)(2)(iii) § 63.148(b)(3) [G]§ 63.148(b)(2)(iii) § 63.148(b)(2)(iii) § 63.148(b)(3) [G]§ 63.148(b)(2)(iii) § 63.148(b)(2)(iii) § 63.148(b)(2)(iii) § 63.148(b)(3) [G]§ 63.148(b)(2)(iii) § 63.148(b)(2)(iii) § 63.148(b)(2)(iii) § 63.148(b)(2)(iii) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2) § 63.148(b)(2)	§ 63.147(b) § 63.147(b)(4) § 63.147(e) § 63.148(g)(2) § 63.148(i)(1) § 63.148(i)(2) [G]§ 63.148(i)(2) [G]§ 63.148(i)(5) § 63.148(i)(6) [G]§ 63.152(a) [G]§ 63.152(f)	§ 63.146(b)(4) § 63.146(b)(5) § 63.146(b)(6) § 63.146(b)(7) [G]§ 63.146(b)(8) § 63.146(b)(9) § 63.146(b)(9)(ii) [G]§ 63.146(d) § 63.146(f) § 63.148(j) § 63.148(j)(1) [G]§ 63.151(b) § 63.151(e) § 63.151(e)(2) § 63.151(e)(3) § 63.151(e)(3) § 63.151(f)(1) § 63.151(f)(1) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(2) § 63.151(f)(3) § 63.151(f)(3) § 63.151(f)(3) § 63.151(f)(3) § 63.151(f)(3) § 63.151(f)(2) § 63.151(f)(3) § 63.151(f)(3) § 63.151(f)(3) § 63.152(b) [G]§ 63.152(b) [G]§ 63.152(b)(1) [G]§ 63.152(b)(1) [G]§ 63.152(c)(3)(i) § 63.152(c)(3)(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)

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Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination	
ID No.	Group/Inclusive Units			
324-PORTNK	N/A	30 TAC Chapter 115, Storage of VOCs	Storage vessel has a capacity less than 1000 gallons.	
GRP-TANKS1	324-MS2099, 324-MS2100, 324-MS2102, 324V-2714, 324V-2715, 324V-2878, 324V-2879, 324V-2880, 324V-2881, 324V-2882, 324V-2883, 326V-2665, 326V-2667	30 TAC Chapter 115, Storage of VOCs	Storage tank stores a VOC with a TVP less than 1.0 psia.	
GRP-TANKS1	324-MS2099, 324-MS2100, 324-MS2102, 324V-2714, 324V-2715, 324V-2878, 324V-2879, 324V-2880, 324V-2881, 324V-2882, 324V-2883, 326V-2665, 326V-2667	40 CFR Part 60, Subpart Kb	Storage vessel has a capacity greater than 151 m3 storing a liquid with a TVP less than 3.5 kPa.	
GRP-TANKS1	324-MS2099, 324-MS2100, 324-MS2102, 324V-2714, 324V-2715, 324V-2878, 324V-2879, 324V-2880, 324V-2881, 324V-2882, 324V-2883, 326V-2665, 326V-2667	40 CFR Part 61, Subpart FF	Storage vessel does not store benzene waste.	
GRP-TANKS2	324V-2885, 324V-2891, 324V-2892	30 TAC Chapter 115, Storage of VOCs	Storage tank stores a VOC with a TVP less than 1.0 psia.	
GRP-TANKS2	324V-2885, 324V-2891, 324V-2892	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3.	
GRP-TANKS2	324V-2885, 324V-2891, 324V-2892	40 CFR Part 61, Subpart FF	Storage vessel does not store benzene waste.	

New Source Review Authorization References

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New Source Review Authorization References by Emission Unit	. 24

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 19136	Issuance Date: 05/28/2019	
Authorization No.: 20222	Issuance Date: 09/25/2018	
Authorization No.: 26866	Issuance Date: 03/31/2016	
Authorization No.: 38105	Issuance Date: 02/15/2018	
Authorization No.: 5361	Issuance Date: 12/09/2015	
Authorization No.: 6091	Issuance Date: 02/13/2018	
Authorization No.: 6194	Issuance Date: 06/13/2019	
Authorization No.: 7748	Issuance Date: 05/03/2013	
Permits By Rule (30 TAC Chapter 106) for the Application Area		
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.262	Version No./Date: 11/01/2003	
Number: 106.352	Version No./Date: 09/04/2000	
Number: 106.472	Version No./Date: 09/04/2000	
Number: 106.532	Version No./Date: 09/04/2000	

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
111-EFFLUNT	TMP AND PE EFFLUENT PIT SUMP	7748
112-EFFLUNT	MRU EFFLUENT SYSTEM	19136
117-EFFLUNT	MO IV EFFLUENT SUMP	7748
121-EFFLUNT	WEAK FORMALDEHYDE EFFLUENT SYSTEM	26866
122-EFFLUNT	MO III EFFLUENT SYSTEM	19136
125-EFFLUNT	FORMCEL UNIT EFFLUENT SYSTEM	6194
250-EFFLUNT	SHIPPING SERVICES EFFLUENT (CLEANING RACK)	7748
32-2664SU	SUMP FOR V-2664	106.532/09/04/2000
324-DVTSUM	AREATION TANKS V-2881 & V-2882	106.532/09/04/2000
324-DWSUMP	DIVERT MANIFOLD SUMP TO MAIN EFFLUENT HEADER	106.532/09/04/2000
324-FLARE	REACTOR FLARE STACK T-346	106.532/09/04/2000
324-MC151	BIO SOLIDS DRYER	106.532/09/04/2000
324-MC414	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MC415	CONVEYOR PUG MILL	106.532/09/04/2000
324-MC416	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MC417	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MC418	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MC421	SCREENER/SHAKER	106.532/09/04/2000
324-MC422	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MC423	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MC424	CONVEYOR BIO SOLIDS	106.532/09/04/2000

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
324-MC425	CONVEYOR BIO SOLIDS	106.532/09/04/2000
324-MS1829	BELT FILTER PRESS	106.532/09/04/2000
324-MS2099	PRIMARY CLARIFIER	106.532/09/04/2000
324-MS2100	SECONDARY CLARIFIER	106.532/09/04/2000
324-MS2102	SPARGE CLARIFIER	106.532/09/04/2000
324-MS3018	SWECO SCREENER	106.532/09/04/2000
324-MS3020	SAND FILTER	106.532/09/04/2000
324-MS3021	SAND FILTER	106.532/09/04/2000
324-MS3022	SAND FILTER	106.532/09/04/2000
324-MS3320	SAND FILTER	106.532/09/04/2000
324-MS3321	SAND FILTER	106.532/09/04/2000
324-MX1310	BIO-SOLIDS PUG MILL	106.532/09/04/2000
324-PLYMXS	SUMP FOR POLYMER MIXING	106.532/09/04/2000
324-PORTNK	PORTABLE TANK FOR PRIMARY CLARIFIER SCUM BOX	106.532/09/04/2000
324-ROLBXS	ROLLOFF BOX SUMP	106.532/09/04/2000
324-RXAREA	REACTOR AREA SUMP	106.532/09/04/2000
324-SNDFLS	SUMP PUMPED TO AERATION TANKS	106.532/09/04/2000
324-SWRSUM	UNIT SEWER SUMP TO MAIN EFFLUENT	106.532/09/04/2000
324V-1187	PRECOAT FILTERS BODY FEED TANK	106.261/11/01/2003, 106.262/11/01/2003
324V-1188	PRECOAT FILTERS RECYCLE TANK	106.261/11/01/2003, 106.262/11/01/2003
324V-2467	PRECOAT FILTERS WASH TANK	106.532/09/04/2000

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
324V-2562	ANAEROBIC REACTOR	106.532/09/04/2000
324V-2566	JACKETED WATER SURGE TANK	106.532/09/04/2000
324V-2663	POLYMER MIX TANK	106.532/09/04/2000
324V-2664	BELT WASH RESIDUE TANK	106.532/09/04/2000
324V-2714	DIVERT TANK	106.261/11/01/2003, 106.262/11/01/2003
324V-2715	DIVERT TANK	106.532/09/04/2000
324V-2878	SURGE TANK	106.532/09/04/2000
324V-2879	OFF-SPEC SURGE TANK	106.532/09/04/2000
324V-2880	EQUILIZATION TANK	106.532/09/04/2000
324V-2881	AERATION TANK	106.532/09/04/2000
324V-2882	AERATION TANK	106.532/09/04/2000
324V-2883	DIVERT TANK	106.261/11/01/2003, 106.262/11/01/2003
324V-2885	SPARGE SCUM TANK	106.532/09/04/2000
324V-2888	DILUTE POLYMER TANK	106.532/09/04/2000
324V-2890	RECEIVING TANK	106.532/09/04/2000
324V-2891	SPARGE CLARIFIER TANK	106.532/09/04/2000
324V-2892	SPARGE OUTFALL TANK	106.532/09/04/2000
324V-2894	SAND FILTER BACKWASH TANK	106.532/09/04/2000
324V-2963	PRECOAT WASH TANK	106.261/11/01/2003, 106.262/11/01/2003
324V-2964	PRECOAT FILTER DRAIN TANK	106.261/11/01/2003, 106.262/11/01/2003
324V-3026	ANAEROBIC REACTOR	106.532/09/04/2000

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
324V-TSUMP	VACUUM TRUCK SUMP	106.532/09/04/2000
326V-2665	DISPOSAL WELL SURGE TANK	106.532/09/04/2000
326V-2667	DISPOSAL WELL SURGE TANK	106.261/11/01/2003, 106.262/11/01/2003
BCUSUMP	BCU SUMP TO LAMELLA EFFLUENT LINE	5361
CXSUMP	CELANEX SUMP TO EFFLUENT LINE	5361
NYLONSUMP	NYLON SUMP TO EFFLUENT LINE	5361
PROWWTP	WASTEWATER TREATMENT PLANT PROCESS	106.532/09/04/2000
SH1SUMP	SH-1 SUMP TO LAMELLA EFFLUENT LINE	6091
SPSUMP	SPECIAL PRODUCTS SUMP TO LAMELLA EFFLUENT LINE	38105
TO1SUMP	TO-1 SUMP TO LAMELLA EFFLUENT LINE	20222
TO2CELCONS	TO-2 SUMP TO CELCON EFFLUENT LINE (JUMPER)	20222
TO2SUMP	TO-2 SUMP TO LAMELLA EFFLUENT LINE	20222

	Alternative Requirement	
Alternative Requirement		 29
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Bryan W. Shaw, Ph.D., P.E., Chairman Toby Baker, Commissioner Jon Niermann, Commissioner Richard A. Hyde, P.E., Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 6, 2016

MR HECTOR GONZALES ENVIRONMENTAL ENGINEER, EHS&S TEAM **BISHOP FACILITY** TICONA POLYMERS, INC. 5738 CR 4, HWY 77 SOUTH BISHOP, TEXAS 78343

Alternative Method of Compliance (AMOC) #65 Bishop Wastewater Treatment Plant Monitoring for HON MACT Compliance

Regulated Entity Number: 101625721 Customer Reference Number: 600124184

Affected Permits: Permit by Rule §106.352, Federal Operating Permit O3269

Dear Mr. Gonzales:

This correspondence is in response to Ticona Polymers, Inc. (Ticona) request received May 31, 2016 requesting to use an alternative monitoring method to comply with 40 CFR-63, Subpart G National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (commonly known as the HON MACT) for the Bishop Facility Wastewater Treatment Plant (WWTP). The WWTP, specifically two anaerobic reactors (EPNs 324V-2562 and 324V-3026), is applicable to the HON MACT and Ticona has requested alternative parameteric monitoring under §63.151(f).

The recirculation of liquid in the reactors, the concentration of organics, the flow rate, and the chemical oxygen demand (COD) are all fundamental operational parameters to ensure performance. The HON allows operators to choose compliance method options to demonstrate compliance.

We understand that the WWTP treats process wastewater streams that are subject to the HON MACT as Group 1 or Group 2 (based on flows and hazardous air pollutant (HAP) concentrations). The anaerobic reactors are the treatment required by the HON MACT. Further, Ticona requests to monitor the performance of the reactors via the COD removal efficiency. The incoming feed to the reactors will be sampled at the equalizer (EQ) tank which feeds both reactors. The effluent stream of each reactor will also be sampled. The concentration (ppm) and flow (MGD) are used to determine COD Loading. The monitor used for concentration samples has a sufficient range to cover all operating conditions and is required by 40 CFR Part 136.3 for National Pollutant

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Mr. Gonzales Page 2 October 6, 2016

Discharge Elimination System (NPDES) compliance monitoring. These parameters and overall performance of the reactors will be monitored every weekday, and the daily average COD efficiency will be evaluated monthly to ensure a minimum 60% effectiveness in compliance with §63.146(d)(1). Appropriate data collection, record keeping and reporting will also occur in compliance with these federal rules.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has reviewed your supporting documentation and made a final decision to approve your request. The TCEQ has been delegated authority to enforce the above cited standards in 40 CFR 63 and is authorized to approve this AMOC method. You are reminded that the monitored data must demonstrate compliance with the HON MACT.

This AMOC approval may supersede certain requirements or certified representations for the unregistered permit by rule §106.532. To ensure effective and consistent enforceability, we request that Ticona incorporate this AMOC into the on-site records for the WWTP.

This approval will also change applicable requirements for the site, including existing testing and monitoring requirements which are identified in the federal site operating permit (SOP) Number O3269. The TCEQ will review any necessary changes under the separate and pending SOP revision.

This action is taken under authority delegated by the Executive Director of the TCEQ. If you have any questions, please call Anne Inman, P.E. at (512) 239-1276, or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Michael Wilson, P.E., Director

Air Permits Division

Neckarl

Texas Commission on Environmental Quality

cc: Mr. Mark Hansen, Acting Associate Director Air Programs, U.S. EPA Region 6, Dallas, TX

Project No.: 255086

	Appendix A	
Acronym List		32

Acronym List

The following abbreviations or acronyms may be used in this permit:

A C E M	actual cubic feet per minute
	alternate means of control
	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
	control device
	continuous emissions monitoring system
	continuous opacity monitoring system
CVS	closed vent system
D/FW	
	emission point
	U.S. Environmental Protection Agency
	emission unit
	Federal Clean Air Act Amendments
	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
	Houston/Galveston/Brazoria (nonattainment area)
	hydrogen sulfide
	identification number
ID/Nr	pound(s) per hour
	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO	nitrogen oxides
NSPS	
	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
	Permit By Rule
	predictive emissions monitoring system
	particulate matter
• •	parts per million by volume
	process unit
	prevention of significant deterioration
psia	pounds per square inch absolute
	state implementation plan
	sulfur dioxide
	Texas Commission on Environmental Quality
	texas Commission on Environmental Qualitytotal suspended particulate
	ioral suspended particulate
	true vapor pressure
U.S.C	